

EXHIBIT “C”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

NATIONAL OILWELL VARCO, L.P.

Plaintiff,

v.

JULIO C. GARZA

Defendant.

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Civil Action No. 4:22-CV-02006

JULIO GARZA’S RESPONSES TO PLAINTIFF’S SECOND SET OF INTERROGATORIES

TO: National Oilwell Varco, L.P., by and through its attorneys of record, Stuart W. Lapp, Bret W. Davis and Joshua A. Redelman, Stibbs & Co., P.C., 750 William D. Finch, Suite 210, College Station, Texas 77845.

Defendant Julio Garza, pursuant to the Federal Rules of Civil Procedure and the Expedited Discovery Order, dated June 29, 2022 (Dkt. 24) entered in this case, responds to Plaintiff’s Second Set of Interrogatories by National Oilwell Varco, L.P. (“NOV”).

Respectfully submitted,

BALCH & BINGHAM LLP

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JULIO C. GARZA

PLAINTIFF'S SECOND SET OF INTERROGATORIES

INTERROGATORY NO. 11: Identify all electronic storage devices that are currently in Your possession, Your counsel's possession, Array Technologies' counsel's possession, or Jared Trent's possession that You used while at NOV or Array Technologies, Inc.

ANSWER: Garza objects to this request as it is unduly burdensome and overly broad in that it requests information that is not discoverable under the Rules. Specifically, there is no basis for the identification of all electronic storage devices that he ever used at NOV or Array Technologies, the request for which is intrusive and harassing, unduly burdensome and overly broad. Garza objects to this request as it is duplicative of prior requests propounded by NOV in this case, and to which Garza responded. Garza also objects to this request to the extent the information is outside of his possession, custody and control. Subject to and without waiving such objections, Garza responds as follows:

I may have used the following electronic storage devices while at NOV or Array Technologies, Inc., which are currently in the custody of FTI Consulting are: (i) my personal iPhone 11; (ii) a grey/blue and silver USB with slide-on lid (has "Stress Engineering Services" label); (iii) a black and metallic flip drive (has "PROGRESSION www.progressiontech.com" label); and (iv) a black and dark grey USB with a slide-on lid.

I am unaware what electronic storage devices might be in the possession of counsel for Array Technologies.

INTERROGATORY NO. 12: Identify the terms and conditions of your administrative leave from Array Technologies, Inc.

ANSWER: Garza objects to this request as it is unduly burdensome and overly broad as it requests information that is not discoverable under the Rules. In particular, the terms of Garza's administrative leave from Array is irrelevant to the claims and defenses in this case and as such, the production of such information is not proportional to the needs of the case, given the issues at stake in the action, the parties' resources, and the importance of the discovery in resolving the issues. Subject to and without waiving such objections, Garza responds as follows:

I am currently on administrative leave. I received the document produced herewith and identified as GARZA_000200 pertaining to my administrative leave.

INTERROGATORY NO. 13: Describe generally each project or product You have worked on for Array Technologies, Inc., and Your involvement with said projects or products. This request seeks only information sufficient to identify the general nature of the projects and does not seek any confidential or trade secret information belonging to or about Array Technologies, Inc.

ANSWER: My primary responsibilities involved in design review and analysis of an existing design for a component, including the running of final FEA analyses. I was also tasked with a project to prepare computation of fluid dynamics for the analysis of an existing